

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EVERARDO ORTIZ,)	
)	
Plaintiff,)	Case No. 1:17-cv-05558
)	
v.)	Judge Jorge L. Alonso
)	Magistrate Judge Jeffrey T. Gilbert
THOMAS J. DART, CONNIE MENNELLA,)	
PATRICE LASSA, JAMIE CROTHERS,)	
TYRISHA CLARY, GINA CHUNG, NGOZI)	
IRENE CHINEDU, TORRENCE GRESHAM-)	
TROTTER, and COOK COUNTY, ILLINOIS)	
)	
Defendants.)	

**JOINT MOTION TO SUBSTITUTE PARTIES PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 25(d)**

Now comes Plaintiff and Defendants and jointly present their Motion to Substitute Parties as follows:

1. The parties have reached a global settlement in this case as, well as *Ortiz v. Nurse Hannah*, Case No. 17-cv-4437.
2. The Defendants, Thomas Dart, Connie Mannella, Patrice Lassa, Jamie Crothers, Tyrisha Clary, Gina Chung, Ngozi Irene Chinedu, Torrence Gresham-Trotter, are currently, or were at some point, employed by entities controlled by Cook County.
3. Cook County is the indemnitor for all Defendants in this case.
4. Pursuant to Federal Rule of Civil Procedure 25(d), the parties seek to substitute Cook County as the lone Defendant in this matter for purposes of indemnification and settlement.

5. Once this order is granted, the parties will sign the appropriate settlement documents and enter a stipulation of dismissal.

Date: November 17, 2020

/s/ Joan E. Ahn

Burke, Warren, MacKay & Serritella
330 North Wabash Avenue, 21st Floor
Attorney for Plaintiff

/s/ Danielle A. Mikhail

Assistant State's Attorney
Cook County State's Attorney's Office
500 Richard J. Daley Center
Chicago, IL 60602
Attorney for Defendant Dart

/s/ Mia Buntic

Assistant State's Attorney
Cook County State's Attorney's Office
50 West Washington, Suite 2760
Chicago, IL 60602
Attorney for Defendants Mennella, Lassa,
Crothers, Clary, Chinedu, Gresham-Trotter,
and Cook County

CERTIFICATE OF SERVICE

The undersigned certifies that on November 17, 2020, she electronically filed the foregoing document with the Clerk of the Court for Northern District of Illinois, using the CM/ECF system of the Court.

By: /s/ Mia Buntic

Mia Buntic